| Case 3 | :21-cv-00568-L | Document 16 | Filed 10/06/20 | Page 1 of 2 | PageID 416 |
|--------|----------------|-------------|----------------|-------------|------------|
|--------|----------------|-------------|----------------|-------------|------------|

| | 5 |
|---|---|
| | 6 |
| | 7 |
| | 8 |
| | 9 |
| 1 | 0 |
| 1 | 1 |
| 1 | 2 |
| 1 | 3 |
| 1 | 4 |
| 1 | 5 |
| 1 | 6 |
| 1 | 7 |
| 1 | |
| 1 | 9 |
| 2 | 0 |
| 2 | 1 |
| 2 | 2 |
| 2 | |
| 2 | 4 |
| 2 | 5 |
| | |

26

27

| 1 | MARK F. FERRARIO, ESQ. |
|---|--------------------------------------|
| 2 | Nevada Bar No. 1625 |
| | JASON K. HICKS, ESQ. |
| 3 | Nevada Bar No. 13149 |
| , | GREENBERG TRAURIG, LLP |
| 4 | 10845 Griffith Peak Drive, Suite 600 |
| 5 | Las Vegas, Nevada 89135 |
| | Telephone: (702) 792-3773 |
| 6 | Facsimile: (702) 792-9002 |
| 7 | Email: ferrariom@gtlaw.com |
| | hicksja@gtlaw.com |

Attorneys for Defendant Provident Trust Group, LLC

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

KENNETH LANE, et al.,

Plaintiffs,
v.

CONESTOGA SETTLEMENT SERVICES,
LLC, et al.,

Defendants.

Case No.: 2:20-cv-01716-APG-BNW

STIPULATION AND [PROPOSED] ORDER TO EXTEND THE TIME FOR DEFENDANT PROVIDENT TRUST GROUP, LLC TO RESPOND TO COMPLAINT

Plaintiffs, by and through their counsel of record, Reese Marketos LLP and King & Durham, PLLC, and Defendant Provident Trust Group, LLC ("Provident"), by and through its counsel of record, Greenberg Traurig, LLP, hereby stipulate to an extension of time by which Provident must respond to the Complaint by thirty (30) days up to, and including, **November 9, 2020** (November 8 being a Sunday). This Stipulation is made and based upon the following:

1. Plaintiffs filed their Complaint on September 17, 2020, in which they allege that Defendants engaged in tortious conduct and misrepresented certain aspects of life settlement investments. ECF No. 1. Plaintiffs seek certification to represent a class of similarly situated individuals across the country. *Id*.

| 1 | |
|----|--|
| 2 | |
| 3 | |
| 4 | |
| 5 | |
| 6 | |
| 7 | |
| 8 | |
| 9 | |
| 10 | |
| 11 | |
| 12 | |
| 13 | |
| 14 | |
| 15 | |
| 16 | |
| 17 | |
| 18 | |
| 19 | |
| 20 | |
| 21 | |
| 22 | |
| 23 | |
| 24 | |
| 25 | |

26

27

28

- 2. Provident was served with the Complaint on September 18, 2020. Provident's response is currently due October 9, 2020.
- 3. Counsel for Provident represent that they have recently been engaged and require additional time to evaluate Plaintiffs' allegations and prepare a response, taking into account the exercise of due diligence.
- 4. In light of the foregoing, the parties agree and request that Provident shall have up to, and including, **November 9, 2020**, to respond to the Complaint.
- 5. Provident thus requests that the Court accept this Stipulation and enter this proposed order. This is the first request for an extension of time. This Stipulation is entered into in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 2nd day of October 2020. DATED this 2nd day of October 2020.

GREENBERG TRAURIG, LLP

REESE MARKETOS LLP

/s/ Jason K. Hicks

Mark F. Ferrario, Esq. Jason K. Hicks, Esq.

Attorneys for Defendant Provident Trust Group, LLC

/s/Brett S. Rosenthal

Adam Sanderson, Esq. Brett S. Rosenthal, Esq.

Gregory H. King, Esq. Matthew Durham, Esq. KING & DURHAM PLLC

Attorneys for Plaintiffs

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

DATED: October 6, 2020.